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August 20, 2019

Via Electronic Filing

The Honorable Magistrate Judge Steven Tiscione
U.S. District Court Eastern District of New York
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Chincha v. Patel*
Case No.: 1:17-cv-06127-ILG-ST

Dear Honorable Judge Tiscione:

This law firm represents Defendant Manojkumar Patel (the “Defendant”) in the above-referenced action. This letter is submitted jointly with Plaintiff.

Pursuant to Your Honor’s August 6, 2019 Order, this letter respectfully serves as a status report concerning the discovery in the above-referenced matter.

Pursuant to Rule I(D) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to extend the discovery completion date of August 21, 2019 to, through and including, November 21, 2019, due to the prior issues concerning discovery in this case. [See Dckt. No. 34]. This is the fourth request for an extension of time, and this request is not made lightly.

Out of an abundance of caution, the parties will require additional time to issue requests for any lingering paper discovery following the completion of depositions.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein

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